

REMARKS

Upon entry of this amendment, claims 1-10 and 14-15, are all the claims pending in the application. By this Amendment, Applicant amends claim 1. Claim 1 has been amended solely for the purpose of improved readability and clarity. Applicant respectfully submits that this amendment does not narrow the scope of the claim and does not raise any Festo implications.

I. Preliminary Matters

Applicant thanks the Examiner for acknowledging that recitation of claim 1 “sandwiched by” does not preclude the electrodes from sandwiching other layers (see page 4 of the Office Action).

II. Claim Rejections under 35 U.S.C. § 102(b)

Claims 1, 3-10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,500,750 to Kanbe et al. (hereinafter “Kanbe”). Applicant respectfully traverses this rejection on the following basis.

Of these claims, only claim 1 is independent. Claim 1, recites:

...a number of irregularly arranged
depressions which are surrounded by
interconnected protrusions...

The Examiner asserts that Kabe’s depressions and bumps of the surface of the insulating film are similar to depressions and protrusions as set forth in claim 1 (see page 2 of the Office Action).

Applicant respectfully disagrees with the Examiner. Applicant has carefully studied Kabe’s

discussion of the depressions and bumps 42a, which are not similar to the depressions and protrusions as set forth in claim 1.

Kanbe teaches film 42 with bumps 42a corresponding to the bumps 42b formed on the organic insulating film 42 (Fig. 1; col. 7 lines 45 to 57). These bumps 42a are formed by using mask 51, which has a light shielding regions consisting of three or more different sized circles (Fig. 5; col. 9, lines 33 to 48). That is, Kanbe teaches that the bumps 42a are formed in this light shielding regions (col. 6, lines 1 to 15; col. 10, lines 55 to 65). These bumps can be randomly arranged and can be of the same or different sizes (col. 5, lines 62 to 65).

However, for Kanbe, the depressions are not isolated and surrounded by the protrusions. As is clear from the subject application the interconnected protrusions that isolate and surround the depressions help prevent protrusion flaking. That is, Kanbe is no different from the conventional prior art. In Kanbe, it is the protrusions (the shaded area) of different circular sizes that are surrounded and isolated by the depressions (the unshaded area), see Fig. 5. In short, Kanbe fails to teach or suggest depressions being isolated and surrounded by interconnected protrusions. Kanbe clearly shows that the protrusions and not the depressions are made to be isolated from each other, Fig. 5.

For at least these reasons, Applicant respectfully submits that independent claim 1 is patentably distinguishable from Kanbe. Applicant therefore respectfully requests the Examiner to reconsider and to withdraw this rejection of independent claim 1. Also, Applicant respectfully submits that claims 3-10 are allowable at least by virtue of their dependency on claim 1.

III. Allowable Subject Matter

Applicants respectfully thanks the Examiner for allowing claim 15 and for indicating that claims 2 and 14 would be allowable if rewritten in their independent forms. Applicants rewrote claims 2 and 14 in their independent form. Therefore, Applicants respectfully request that the Examiner withdraw the objection to claims 2 and 14.

IV. Conclusion and request for telephone interview.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly invited to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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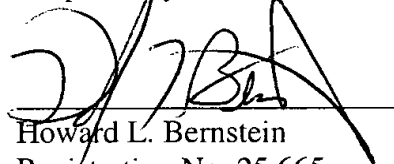
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Respectfully submitted,


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